

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

*ELECTRONICALLY FILED*

TIMOTHY OAKLEY AND ]  
MONICA OAKLEY ]  
 ]  
PLAINTIFFS ]  
 ] No. 3:10-0931  
VS. ] JURY DEMAND  
 ]  
ALLSTATE INSURANCE COMPANY ]  
 ]  
DEFENDANT ]  
 ]

---

**PLAINTIFFS' MOTION TO COMPEL**

The Plaintiffs, by counsel, move the Court for an Order compelling the Defendant, Allstate Insurance Company, to answer the Request for Production of Documents Propounded on Defendants, which was served upon Defendants with the Complaint herein. A copy of said requests is attached hereto.

On January 5, 2011, Plaintiffs' counsel made a written inquiry of the Defendant's counsel as to the status of response, and to date, has received no reply.

Pursuant to the Local Rules, Plaintiffs certify that an attempt has been made to resolve this matter with the Defendant, but Plaintiffs have received no response

whatsoever to same, and accordingly, must file this Motion seeking relief from the Court.

This February 2, 2011.

**/s/ Mike Breen**

---

Mike Breen  
MIKE BREEN ATTORNEY AT LAW  
870 Fairview Ave., Suite 5  
P O Box 3310  
Bowling Green, KY 42102-3310  
Telephone (270) 782-3030

and

**/s/ Zale Dowlen**

---

Zale Dowlen  
Attorney at Law  
108 Lauren Drive  
White House, TN 37188  
Telephone (615) 497-0763

### **Certificate of Service**

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

David M. Waldrop, Esq.  
WALDROP, BARNETT, LAZAROV & NEARN, P.C.  
9032 Stone Walk Place  
Germantown, TN 38138

This February 2, 2011.

**/s/ Mike Breen**

---

Mike Breen